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August 19, 2019

**VIA ECF**

Hon. Carol Bagley Amon  
United States District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *Bartlett, et al. v. Société Générale de Banque au Liban SAL, et al.*, Case No. 19-cv-007  
(E.D.N.Y.)**

Dear Judge Amon:

This law firm represents Fenicia Bank (“Fenicia”), which was added as a newly-named Defendant in the Amended Complaint filed on August 2, 2019 (ECF No. 105) in the above-referenced action. We write on behalf of Fenicia and the Plaintiffs, pursuant to Section 2(A) and 2(D) of the Court’s Individual Motion Practices and Rules (the “Rules”). Counsel for Fenicia and the Plaintiffs respectfully request that the Court adopt the enclosed Stipulation and [Proposed] Order, which, among other things, provides that Fenicia shall waive service of process while reserving all other defenses, and that Fenicia’s time to answer or otherwise respond to the Amended Complaint shall be extended until November 1, 2019.

Fenicia is a financial institution headquartered in Lebanon. It was brought into this case for the first time upon the filing of the Amended Complaint on August 2, 2019 and retained U.S. counsel shortly thereafter. This is Plaintiffs’ and Fenicia’s first request for an extension of any kind related to Fenicia in this action.

On August 16, 2019, all twelve Defendants, including Fenicia, filed a pre-motion conference letter and joint request to respond to the Amended Complaint by filing an omnibus motion to dismiss not later than November 1, 2019, with a proposed briefing schedule agreed upon by Plaintiffs and Defendants (subject to the Court’s approval) (ECF No. 110). As reflected in the enclosed Stipulation, Fenicia intends to join the Defendants’ omnibus motion to dismiss the Amended Complaint, and the Stipulation will facilitate this by allowing Fenicia to respond to the Amended Complaint on the same schedule as proposed in the Defendants’ pre-motion letter.

Plaintiffs and Fenicia expressly reserve all of their respective rights, defenses, privileges, and immunities.

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**VIA ECF**

We thank the Court in advance for its consideration of this joint request of Plaintiffs and Fenicia.

Sincerely,

Squire Patton Boggs (US) LLP

/s/ Gassan A. Baloul  
Gassan A. Baloul

cc: All counsel of record (via ECF)